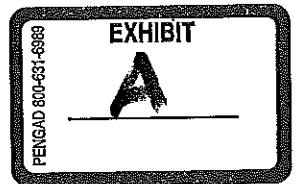


**MONICA DANIEL HUTCHISON**



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1 A. I don't believe he invited me out while I  
2 was at the prosecutor's office. This was  
3 just at the law office.

4 Q. Okay. And did you ever go?

5 A. To get in the hot -- no.

6 Q. No?

7 A. No.

8 Q. Did you ever tell him you had any interest  
9 in going out there?

10 A. No.

11 Q. Okay. Did Dianne ever invite you out?

12 A. I don't believe so, no.

13 Q. Okay. Did you ever invite Dianne and Mike  
14 to go with you anywhere?

15 A. I had asked them to go to lunch with me.

16 Q. Okay. Did you invite them to go anywhere  
17 else with you?

18 A. I had invited Dianne over for -- I had,  
19 like, a cookie party. I invited her over  
20 for that. That's all I can recall.

21 Q. Okay. Was there ever an occasion, either  
22 during the time that you were working in the  
23 private law practice or working in the  
24 prosecutor's office, when you invited Dianne  
25 and Mike to accompany you to a strip club?

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1 A. This was at a conference.

2 Q. Where was the conference?

3 A. At the lake.

4 Q. Okay.

5 A. And the answer, I guess, would be yes.

6 Q. Okay. So how was it that you came to invite  
7 Dianne and Mike to go to a strip club at the  
8 lake?

9 A. It was a club that had male dancers at the  
10 time, and it was kind of a joke.

11 Q. Okay.

12 A. 'Cause I didn't explain to Mr. Anderson it  
13 was male dancers.

14 Q. Okay. Did you think that he might find that  
15 an uncomfortable situation?

16 A. I don't know how he would have found that.

17 Q. Well, you didn't tell him and the joke was  
18 that --

19 A. Right.

20 Q. -- presumably that he'd get there and be  
21 uncomfortable; right?

22 A. Right, right.

23 Q. Was Dianne in on the joke?

24 A. No.

25 Q. No. So she didn't know either?

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1 A. No.

2 Q. Was there ever any other occasion when you  
3 invited Mike and Dianne to go to a strip  
4 club with you?

5 A. I know that me and some of my friends had  
6 went to a club on my birthday, and I believe  
7 we invited Dianne to go with us.

8 Q. Do you remember when that was?

9 A. But I don't recall for sure if we did invite  
10 her.

11 Q. Do you remember when that was?

12 A. No, I don't.

13 Q. Was that while you were with the  
14 prosecutor's office?

15 A. Yes.

16 Q. And was that a club that had men or a club  
17 that had women?

18 A. Women.

19 Q. Where was it? Yes, where was it?

20 A. At St. Robert.

21 Q. In St. Robert, Missouri? Do you remember  
22 the name of the club?

23 A. No, I don't.

24 Q. And who went with you ultimately?

25 A. I'm trying to remember who all -- I don't

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1 remember who all went. There was quite a  
2 few. There was Terry Haden, Lorette Smith,  
3 Millie Williams. I believe  
4 Christina Wheeler went. I don't remember  
5 who else went. I apologize.

6 Q. Okay. So it's fair to say that you went to  
7 this strip club with a number of people who  
8 were either employed in the Texas County  
9 prosecutor's office or employed by the  
10 county as a general proposition?

11 A. They were my friends.

12 Q. But they were employed by either -- in the  
13 prosecutor's office or by the county?

14 A. Not all of them, no.

15 Q. Okay. Who was not employed by the county?

16 A. Terry Haden was not and Lorette Smith was  
17 not.

18 Q. Okay. And did you -- did you invite these  
19 individuals to go with you to this club?

20 A. No. I think we all just decided to go and  
21 eat dinner down there, is what the plan was,  
22 at one of their restaurants down there to  
23 eat dinner.

24 Q. When you say "their restaurants" --

25 A. At St. Robert, one of the restaurants at

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1       St. Robert. I can't recall the name of the  
2       restaurant. Ruby Tuesdays, I believe it  
3       was. And then after that we decided to go  
4       out, so it wasn't actually planned to go to  
5       the strip club. We planned to go down and  
6       have dinner and go out to a club.

7   Q. And you decided that you'd go to this strip  
8       club?

9   A. Correct.

10   Q. All right. Going back to  
11       Defendant's Exhibit 14, in January 2003,  
12       it's my understanding that you began your  
13       employment with the Texas County  
14       prosecutor's office. Is that accurate?

15   A. Yes.

16   Q. Hand you a document that's been labeled  
17       Defendant's Exhibit 6. I thought I did.  
18       Can you identify that?

19   A. It looks like my application for employment.

20   Q. Okay. Looking at the second page under  
21       former employers, it appears that the  
22       correctional center's been omitted as a  
23       former employer. Is there any particular  
24       reason why that was omitted?

25   A. No, other than I must have just forgot, but,

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1       two, three, nights?

2   A.    Correct.

3   Q.    Do you remember any of the social activities  
4        that you engaged in while you were on that  
5        trip?

6   A.    Mr. Anderson always took us to dinner.

7   Q.    Do you remember if you attended any strip  
8        clubs during the course of this particular  
9        trip?

10   A.    I believe that me and Christie may have went  
11        to one -- I'm not positive -- and saw some  
12        male strippers.

13   Q.    Okay.  Approximately how many occasions  
14        during the time that you were employed in  
15        the prosecutor's office did you go to a  
16        strip club with another member of the  
17        prosecutor's office staff?

18   A.    Approximately -- counting that, probably two  
19        or three times.

20   Q.    Okay.  Total over the course of the three  
21        years?

22   A.    I believe so.

23   Q.    And of those two to three times, at least  
24        one was to see male strippers, the other  
25        ones would have been to see female

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1        strippers?

2    A. I believe twice was male strippers.

3    Q. And once with --

4    A. One female, yes.

5    Q. Okay. Do you recall having any discussion  
6        with other members of the prosecutor's  
7        office staff about what went on at the strip  
8        club with female strippers?

9    A. No. I don't recall, I mean, specifically  
10        discussing anything.

11   Q. Okay. Do you recall having any  
12        conversations with members of the  
13        prosecutor's office staff about occasions  
14        when you would go to strip clubs without  
15        other members of the staff and then tell  
16        them about what occurred at a strip club?

17   A. Well, we talked -- I mean, we were all  
18        friends, and we probably -- all of us --  
19        even myself -- talked about things that  
20        wasn't appropriate in the office. Myself,  
21        Mr. Anderson, the other girls, we all talked  
22        about things we probably should have kept  
23        outside of work.

24   Q. And that's not really answering the  
25        question.

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1                   MR. FRANKLIN: Could you read back  
2                   what my question was?

3                   (The requested portion of the  
4                   testimony was read back.)

5   A. No, I don't recall doing that.

6   BY MR. FRANKLIN:

7   Q. Okay. Is it fair to say that you would  
8                   discuss your sex life with other members of  
9                   the prosecutor's office staff?

10   A. It's fair to say that we all discussed --  
11                   like if -- on weekends -- if we had sex,  
12                   someone would say, "Did you get any this  
13                   weekend," you know, comments that probably  
14                   shouldn't have been said by myself or  
15                   anybody else, but we all participated in it,  
16                   yes.

17   Q. Okay. Is it fair to say that you were an  
18                   active and willing participant in these  
19                   conversations?

20   A. Yes.

21   Q. And it's fair to say that you would discuss  
22                   the sexual encounters that you had outside  
23                   of the workplace with the people that you  
24                   worked with?

25   A. Not in detail and not all the time, no.

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1 BY MR. FRANKLIN:

2 Q. Was there a time -- during the period of  
3 time that you worked in the prosecutor's  
4 office, was there -- were you involved in a  
5 sexual encounter with any of the other  
6 members of the office?

7 MR. STEELMAN: And so that I  
8 understand, your question is limited to her  
9 period of public employment, to use  
10 Judge Dorr's words; is that right?

11 MR. FRANKLIN: Yes.

12 MR. STEELMAN: Okay.

13 A. No.

14 BY MR. FRANKLIN:

15 Q. Did you, during the time that you were  
16 employed in the prosecutor's office, discuss  
17 past sexual encounters that you had with  
18 members of the staff in the prosecutor's  
19 office?

20 A. No --

21 Q. Okay.

22 A. -- not that I remember doing so, no.

23 MR. STEELMAN: By the way, let me  
24 interpose an objection. It's pretty clever  
25 the way you worded it, but that clearly was

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1 Q. During the period of time that you were  
2 employed in the prosecutor's office, did you  
3 ask any of your co-workers to join you --  
4 and this would be inclusive of Mr. Willis  
5 and any other sexual partner of yours -- in  
6 some type of a sexual encounter?

7 A. No.

8 Q. Okay. Did you ever physically touch any of  
9 the members of the prosecutor's office staff  
10 on or about their sex organs?

11 MR. STEELMAN: During the time she  
12 was --

13 BY MR. FRANKLIN:

14 Q. During the time you were employed at the  
15 prosecutor's office.

16 A. Not that I recall. We were always goofing  
17 around and -- I mean, it was -- it was one  
18 of those work environments where I was a  
19 part of it. We would joke around all the  
20 time, and we probably took it overboard, but  
21 I don't recall ever --

22 Q. What kind of joking around are you talking  
23 about?

24 A. Like talking about, "Hey, did you get some?"  
25 "Yeah, I did," and -- oh, gosh, just making

1 comments to each other and --

2 Q. Did you ever comment on the physical  
3 features -- did you ever, during the time  
4 that you were employed in the county  
5 prosecutor's office, comment on the physical  
6 features of any of your co-workers in the  
7 office?

8 A. Well, Stephanie Creek would always say, "Oh,  
9 I'm so fat, you know, nobody looks at me."  
10 And I said, "No, you're not. You're  
11 beautiful. You're sexy." I would say  
12 things like that.

13 Q. Did you ever comment on the breasts of any  
14 of the other members of the staff during the  
15 time that you were employed at the county  
16 prosecutor's office?

17 A. Not that I recall.

18 Q. Okay. Was there ever an occasion that you  
19 exposed your breasts to anybody that was  
20 employed in the staff of the prosecutor's  
21 office during the time that you were  
22 similarly employed?

23 A. At my home.

24 Q. Okay. And when was this?

25 A. At a cookie party.

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1 Q. Okay. Did you guys have -- what'd you guys  
2 do after you got out of the pool?

3 A. I don't swim well, so I was actually hanging  
4 on the side. We decided to go back to the  
5 rooms and change and meet down to the social  
6 bar that they had there at the motel.

7 Q. Okay. The hotel lounge, for lack of a  
8 better term?

9 A. Yes.

10 Q. Okay. This was, again, kind of a group  
11 decision. This wasn't Mike saying, "We're  
12 going to meet down there"?

13 A. No, it was everybody.

14 Q. Okay. So did you feel comfortable having  
15 drinks with Mike?

16 A. Yeah.

17 Q. Okay. Had you had drinks with him before?

18 A. At other conferences, yes.

19 Q. Okay.

20 A. Yes.

21 Q. Aside from other conferences, you never had  
22 drinks with him; right?

23 A. I think we had a -- celebratory champagne,  
24 'cause I had never tasted champagne before,  
25 whenever he got into office.

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1 Q. Okay.

2 A. Not that I recall other than that.

3 Q. Did he ever ask you to go to drinks with  
4 him?

5 A. Yeah. He would ask me to -- "Hey, let's go  
6 have a drink and celebrate," like if he had  
7 a good day in court or something.

8 Q. Did you ever go with him?

9 A. No.

10 Q. Okay. And why not?

11 A. I just wasn't comfortable going.

12 Q. Okay.

13 A. I mean, I don't -- I don't want everybody to  
14 think that, you know, Mike really sexually  
15 harassed me all the way through, made it  
16 horrible on me, 'cause it wasn't like that.  
17 It was something that I was handling, and he  
18 wasn't saying, "Hey, let's go have sex every  
19 day or anything." It wasn't like that. It  
20 didn't get bad till later on. I just wanted  
21 to -- 'cause we were all -- even at the  
22 prosecutor's office -- we were all probably  
23 saying and doing things that was  
24 inappropriate in the office.

25 Q. Well, and what I'm -- and you're kind of

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1       alluding to this. What I'm getting at is,  
2       you weren't offended by him asking you to  
3       get a drink to celebrate a court victory or  
4       a good day at the office?

5       A. No, I wasn't offended. I just didn't go.

6       Q. You didn't find that to be harassing?

7       A. No.

8       Q. Okay. All right. So when you went down to  
9       the bar, how many people were down there?

10      A. Well, there was some other conference there,  
11       too, like a Farm Ag or some kind of  
12       conference, so there was probably, I want to  
13       say, between 15 and 30 or -- I'm not  
14       positive. There was quite a bit -- large  
15       group of people.

16      Q. All right. And was it dark or was it light?  
17       Could you see well?

18      A. Yeah, it was, like, off the lobby, so it was  
19       pretty lit.

20      Q. Okay. You guys got drinks when you went in  
21       there though; right?

22      A. Yes.

23      Q. Did Mike get a drink?

24      A. Yes.

25      Q. Had he been drinking at dinner?

1 Q. Did you also have home phone service through  
2 U.S. Cellular?

3 A. No. It was through the local telephone  
4 company.

5 Q. Okay. And that would be the phone number  
6 that's reflected on that document?

7 A. Correct.

8 Q. Okay. All right. So how was it that  
9 Corporal Jeff Kinder is calling you at home?  
10 How did he know you?

11 A. We were friends.

12 Q. How did you become friends?

13 A. I met him whenever he came in to talk with  
14 Mr. Anderson at the private law office.

15 Q. Okay. Did you socialize with him outside of  
16 work?

17 A. Yes.

18 Q. Did you have a romantic relationship with  
19 Corporal Kinder during the period of time  
20 that you were employed in the prosecutor's  
21 office?

22 A. Yes.

23 Q. Okay. For how long did you have a romantic  
24 relationship with Corporal Kinder?

25 A. I'm not positive. Probably close to a year.

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1 Q. Okay. Was he married at the time?

2 A. Yes.

3 Q. Okay. You were aware of that?

4 A. Yes.

5 Q. Did you discuss your relationship with  
6 Corporal Kinder with any of the -- any of  
7 your colleagues in the prosecutor's office?

8 A. Not that I recall.

9 Q. Okay. So if they became aware of your  
10 relationship with Corporal Kinder, it was  
11 not from direct comments from you?

12 A. No.

13 Q. Okay. How else might they have become aware  
14 of your relationship with Corporal Kinder?

15 A. I don't know. He came in the office quite  
16 often to bring in reports and stuff.

17 Q. Okay. During the period of time that you  
18 were engaged in this romantic relationship  
19 with Corporal Kinder, was he -- was your  
20 relationship fairly discreet?

21 A. Yes.

22 Q. Okay. Was there ever an occasion when you  
23 had a romantic encounter with both  
24 Corporal Kinder and his wife during the time  
25 that you were employed in the Texas County

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1 prosecutor's office?

2 A. No.

3 Q. Okay. Was Corporal Kinder's wife ever aware  
4 of your relationship with him?

5 A. Not that I'm aware of, no.

6 Q. Okay. So did you subsequently have -- after  
7 this December 8th call from Corporal Kinder,  
8 did you subsequently have a meeting with  
9 Mike Anderson to discuss your return to the  
10 prosecutor's office?

11 A. Yes.

12 Q. When did that meeting occur?

13 A. I don't remember. I don't even know what  
14 day the first was on, like, through the  
15 week.

16 0, Okay,

17 A. I don't recall what day it was that we  
18 spoke.

19 Q. Was it a long duration or a short duration  
20 between the call with -- between you and  
21 Corporal Kinder?

22 A. Probably a couple days, I would say, but I'm  
23 not real positive.

24 Q. Okay. And where did this conversation occur  
25 with Mr. Anderson?

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1 BY MR. FRANKLIN:

2 Q. Was working on the criminal cases a better  
3 position than working on the child support  
4 or no --

5 A. It just depended on how you view it, if you  
6 like that or you like the other. I didn't  
7 do child support, so I don't know.

8 Q. Okay. Was there any level of supervision  
9 that the person in charge of criminal had  
10 over the other individuals?

11 A. No.

12 Q. What about Stephanie Creek --  
13 notwithstanding the objection I understand  
14 Mr. Steelman will pose -- do you have any  
15 reason to believe that Stephanie Creek would  
16 have a reason to lie about your behavior in  
17 the office?

18 MR. STEELMAN: Same objection.

19 A. Yes, same response. I mean, she worked for  
20 Mr. Anderson, and, I mean, I'm sure she  
21 wanted to keep her employment.

22 BY MR. FRANKLIN:

23 Q. You indicated previously that you -- that  
24 during the time that you were employed in  
25 the prosecutor's office you had sexual

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1 A. Not that I'm aware of.

2 Q. Okay. Are you aware of any employment  
3 opportunities that you lost out on as a  
4 result of Mr. Anderson terminating your  
5 employment?

6 A. From when I left on December 23rd?

7 Q. Yes.

8 A. No.

9 Q. Are you aware of any employment  
10 opportunities that you lost -- that you were  
11 unable to obtain because he filed this state  
12 court lawsuit against you in June of 2006?

13 A. I feel like it's detrimental to me even now.

14 Q. I understand that. Are you aware of any  
15 specific job opportunities that you were  
16 unable to obtain because he filed that  
17 lawsuit?

18 A. Not at this time.

19 Q. Okay. Has this lawsuit ever been raised in  
20 the course of an employment interview that  
21 you have been a part of?

22 A. Yes.

23 Q. Okay. What employment interview was it that  
24 this lawsuit was discussed at?

25 A. Almost every one of them except

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1 Q. During the time that you worked at the  
2 prosecuting attorney's office, did you ever  
3 tell anyone in that office that you had gone  
4 to Big Louie's, the strip club in  
5 St. Robert?

6 A. It's possible it was -- that's probably -- I  
7 think that's the name of the strip club  
8 where myself and the co-workers had went to.

9 Q. During the time that you worked at the  
10 prosecutor's office, did you ever talk with  
11 the co-workers about giving oral sex to any  
12 of the dancers there?

13 A. No.

14 Q. Did you ever tell any attorneys who came in  
15 the office that you had done that?

16 A. No.

17 MR. STEELMAN: Can we go off the  
18 record for just a second?

19 (A discussion was held off the  
20 record.)

21 BY MR. HARRIS:

22 Q. Do you have any tattoos?

23 A. Yes.

24 Q. Where are they located?

25 A. I have one right below my waistline here. I